

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STONEWALL INSURANCE COMPANY,
Plaintiff,

v.

XL REINSURANCE AMERICA, INC.
Defendant.

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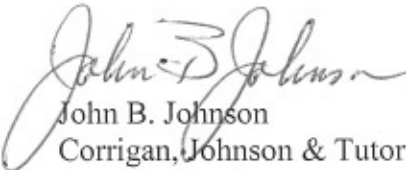
No. 05-11798NG

DEFENDANT'S MOTION TO EXTEND TIME
TO ANSWER COMPLAINT

Defendant XL Reinsurance America, Inc. moves that the time during which it may answer or otherwise respond to the plaintiff's complaint be extended up to and including November 14, 2005.

In support of this motion, the defendant says that the parties have been attempting to resolve this dispute, but the negotiations towards such a resolution recently broke down. The defendant therefore needs this additional time to prepare and file its response to the complaint.

Defendant XL Reinsurance America, Inc.
By its attorney

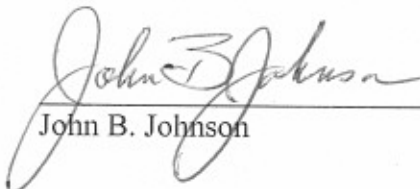


John B. Johnson
Corrigan, Johnson & Tutor, P.A.
141 Tremont Street
Boston, MA 02111
(617) 338-0075
BBO No. 252580

CERTIFICATION IN ACCORD WITH LOCAL RULE 7.1(A)(2)

I certify that, on behalf of Defendant XL Reinsurance America, Inc., I conferred with plaintiff's attorney Kevin J. O'Connor about this motion and attempted in good faith to resolve the issues raised, but was unable to do so.

Dated: October 24, 2005


John B. Johnson

CERTIFICATE OF SERVICE

I, John B. Johnson, on behalf of the defendant, hereby certify that on October 24, 2005 a copy of the above answer, by first class mail-postage prepaid, on Attorney Kevin J. O'Connor, Hermes, Netburn, O'Connor, & Spearing, P.C., 111 Devonshire Street, Boston, MA 02109-5407.


John B. Johnson